

Proposal A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MBIA INSURANCE CORPORATION, et al.,)	
Plaintiffs/Counterclaim Defendants,)	
)	C.A. No. 02-1294-JJF
v.)	
)	
ROYAL INDEMNITY COMPANY,)	
Defendant/Counterclaim Plaintiff.)	
CHARLES A. STANZIALE, JR., Ch. 7 Trustee,)	
Plaintiff,)	
)	
v.)	C.A. No. 04-1551-JJF
)	
PEPPER HAMILTON LLP, et al.,)	
Defendants.)	
CHARLES A. STANZIALE, JR., Ch. 7 Trustee,)	
Plaintiff,)	
)	
v.)	C.A. No. 05-72-JJF
)	
McGLADREY & PULLEN LLP, et al.,)	
Defendants.)	
ROYAL INDEMNITY COMPANY,)	
Plaintiff,)	
)	
v.)	C.A. No. 05-165-JJF
)	
PEPPER HAMILTON LLP, et al.,)	
Defendants.)	

SECOND AMENDED CASE MANAGEMENT ORDER #1

Having considered the submissions of the parties, the following amended schedule supersedes the April 10, 2007 First Amended Case Management Order #1 and will govern pretrial proceedings unless otherwise amended for good cause shown:

1.	8/21/06	Deposition discovery may commence
2.	2/07/07	Discovery status conference

3.	3/12/07	Parties shall serve brief disclosures regarding the subject matters of anticipated expert testimony
4.	3/16/07	Date by which all written discovery must be propounded.
5.	4/30/07	Close of fact discovery
6.	5/7/07	Plaintiffs' expert reports due
7.	6/15/07	Plaintiffs' replacement expert reports due
8.	7/13/07	Defendants' expert reports due
9.	7/27/07	Date by which plaintiffs may submit rebuttal expert reports
10.	7/30/07	Expert discovery may commence
11.	7/30/07	Parties may submit letters to the Court regarding issues to be raised on summary judgment no later than 7/30/07
12.	TBD	Status conference regarding issues to be raised on summary judgment
13.	9/21/07	Close expert discovery
14.	12/14/07	Pretrial order, suggested voir dire questions, proposed jury instructions, and proposed special verdict/interrogatories to be filed pursuant to Local Rules 16.4, 47.1 and 51.1, respectively.
15.	12/19/07	Pretrial conference
16.	1/7/08	Trial commences

SO ORDERED this _____ day of _____, 2007

HONORABLE JOSEPH J. FARNAN, JR.
UNITED STATES DISTRICT JUDGE